

## Significant Irreversible Environmental Effects

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### 7.1 Introduction

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment. As part of this analysis, the Supplemental Environmental Impact Report (SEIR) must also identify: (1) significant environmental effects of a Proposed Project; (2) significant environmental effects that cannot be avoided if a Proposed Project is implemented; and (3) significant irreversible environmental changes that would result from implementation of a Proposed Project.

### 7.2 Significant Environmental Effects that Cannot Be Avoided

Sections 3.1 through 3.11 of this SEIR provide a comprehensive identification of the environmental effects of the Proposed Project, the Partial Gravel Removal Alternative, and the No Project Alternative. These impacts along with identified mitigation measures are summarized in Table ES-1 (Summary of Environmental Impacts and Mitigation Measures), which is contained in the Executive Summary of this SEIR. As discussed in Sections 3.1 through 3.11, there are no significant impacts associated with the Proposed Project; impacts that would be less than significant after mitigation (Class II) have been identified in this SEIR for Aesthetics and Visual Resources and Recreation.

#### 7.2.1 Proposed Project

As discussed in Sections 3.1 through 3.11, the Proposed Project would not involve any changes to current site conditions and would not have any significant impact to any of the addressed resource areas. Further, provision of a monetary contribution (in-lieu fee) by the Applicant for the purchase of property for public recreational or open space purposes at a ratio of not less than 3:1 would offset potentially significant impacts to Aesthetics and Visual Resources and Recreation. These impacts would be less than significant after mitigation (Class II).

#### 7.2.2 No Project Alternative

Implementation of the No Project Alternative, which would involve mining and screening of 293,752 cubic yards (cy) of sand/gravel material and off-site disposition of 1,237 cy of gravel, would result in ground disturbing activities that would have the potential to impact cultural resources, hazards, and hydrology and water quality. However, these construction-related impacts would be less than significant after mitigation (Class II) with the implementation of applicable mitigation measures outlined included the 1982 Final Environmental Impact Report (EIR). Additionally, implementation of the No Action Alternative would result in potentially significant impacts to biological resources as well as land use and planning. Implementation of the No Project Alternative would require the excavation and sifting of sand to a depth of at least 2 to 3 feet and in some cases up to 15 feet deep. Consequently, the No Project Alternative would directly remove vegetation occurring within Site D,

Site 2, the Road Site, and the Upper Area. Two California Department of Fish and Wildlife (CDFW) sensitive natural communities, Central Foredues and Central Dune Scrub, as well as at least five known sensitive plant species occur at the Project Site. Excavation activities would result in removal of vegetation and permanent adverse impacts to approximately 19 acres of CDFW sensitive communities. Mitigation measures for this impact from the 1982 Final EIR, described in Section 3.3, *Biological Resources*, would reduce the impact to less than significant after mitigation (Class II).

The No Project Alternative would also have potential impacts to unique, rare, threatened, or endangered wildlife species and/or habitat that support these species. The Project Site is known to have suitable habitat for western snowy plover as well as California least tern. Mitigation measures for this impact from the 1982 Final EIR, described in Section 3.3, *Biological Resources*, would reduce the impact to less than significant after mitigation (Class II).

### 7.2.3 Partial Gravel Removal Alternative

Implementation of the No Project Alternative, which would involve mining and screening of 73,438 cy of sand/gravel material, and off-site disposition of 688 cy of gravel, would result in ground disturbing activities that would have the potential to impact cultural resources, hazards, and hydrology and water quality. However, these construction-related impacts would be less than significant after mitigation (Class II) with the implementation of applicable mitigation measures outlined included the 1982 Final EIR. Additionally, implementation of the No Action Alternative would result in potentially significant impacts to biological resources as well as land use and planning. Similar to the No Project Alternative, implementation of the Partial Gravel Removal Alternative would require the excavation and sifting of sand to a depth of at least 2 to 3 feet and in some cases deeper. Consequently, this alternative would directly remove vegetation occurring within Site D and the eastern portion of the Road Site. Two CDFW sensitive natural communities, Central Foredues and Central Dune Scrub, as well as at least five known sensitive plant species occur at the Project Site. Excavation activities would result in removal of vegetation and permanent adverse impacts to approximately 4.31 acres of CDFW sensitive communities, a significant and unavoidable impact. Mitigation measures for this impact from the 1982 Final EIR, described in Section 3.3, *Biological Resources*, would reduce the impact to less than significant.

The Partial Gravel Removal Alternative would also have potential impacts to unique, rare, threatened, or endangered wildlife species and/or habitat that support these species. The Project Site is known to have suitable habitat for western snowy plover as well as California least tern. Mitigation measures for this impact from the 1982 Final EIR, described in Section 3.3, *Biological Resources*, would reduce the impact to less than significant.

## 7.3 Significant Irreversible Environmental Effects

Section 15126.2(c) of the California Environmental Quality Act (CEQA) Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the Proposed Project. Specifically, Section 15126.2(c) states:

*Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also,*

*irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses
- The project would involve a large commitment of nonrenewable resources
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy)
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project

### **7.3.1 Proposed Project**

As discussed in Sections 3.1 through 3.11 the Proposed Project would not involve any changes to baseline conditions and would therefore not have any significant irreversible impacts.

### **7.3.2 No-Project Alternative**

Excavation, processing, and hauling activities would involve consumption of energy, some of which is nonrenewable or a locally limited natural resource (e.g., fossil fuels). Nonrenewable resources used for No Project Alternative could no longer be used for other purposes. Consumption of energy is associated with any construction activity in the region, and these commitments of resources are not unique or unusual to the No Project Alternative. The amount and rate of consumption of these resources would not result in significant environmental impacts or the unnecessary, inefficient, or wasteful use of resources. The No Project Alternative would represent an incremental commitment to use of nonrenewable resources, particularly gasoline, for its 5 to 7 month duration. In addition, as discussed in Section 3.2, *Air Quality and Greenhouse Gas Emissions*, use of these non-renewable forms of fuel energy would contribute to the generation of GHGs with an incremental contribution to global climate change. Thus while energy demand and use of non-renewable sources for the Alternative itself would not be significant, the Alternative would also incrementally contribute to resultant secondary impacts to other resources, such as air quality.

The No Project Alternative would not be expected to result in environmental accidents that have the potential to cause irreversible damage to the natural or human environment.

### **7.3.3 Partial Gravel Removal Alternative**

All irreversible environmental impacts described for the No-Project Alternative in Section 6.3.2 also apply to the Partial Gravel Removal Alternative, but to a lesser extent. As the Partial Gravel Removal Alternative is only expected to result in processing of 73,438 cy of sand/gravel material, or 25 percent of the No Project Alternative volume, it can be expected that this alternative would use approximately 25 percent of the fossil fuels that the No Project Alternative would use. This alternative would represent an incremental commitment to use of nonrenewable resources for 2 to 3 months rather than 5 to 7 months. As with the No Project Alternative, the Partial Gravel Removal Alternative would contribute to the generation of GHGs with an incremental contribution to global climate change.

The Partial Gravel Removal Alternative would not be expected to result in environmental accidents that have the potential to cause irreversible damage to the natural or human environment.